

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT Marion 12th district

FILED

DEC 30 2024

Clerk, U. S. District Court
Eastern District of Tennessee
At Chattanooga

Jacob Seth Finley)

_____)

_____)

(Enter above the NAME of the
plaintiff in this action.))

1:24-cv-00401-KAC-CHS

v. 12th district Jasper Drug Task Force)

Brian Davis, Robbie Dykes)

Anna Simmions, Corey Cleek)

Chief Seagraves, Sheriff Billy Woods)

(Enter above the NAME of each
defendant in this action.))

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(42 U.S.C. Section 1983)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES () NO (X)

B. If your answer to A is YES, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to the previous lawsuit:

Plaintiffs: _____

Defendants: _____

United States District Court
Eastern District of Tennessee
At Marion 12th district

Attached to
Page 1
of →

(Complaint for violation of civil Rights) 42 USC Section 1983

(plaintiff:) Jacob Seth Finley

v.

(defendant:) 12th district, "Jasper" department drug task force,

12th district, "Jasper" police department,

12th district, "Whitwell", police department

12th district, "Marion county" Sheriff Billy Woods

12th district, "Whitwell" Chief Kenneth Seagraves

12th district, "Jasper" Cora CleeK

12th district, "Jasper" Bobbie Dykes

12th district, "Jasper" Brian Davis

12th district, "Whitwell" Anna Simmons

Agt. Charles D McVey (Badge number 84)

- Also but not knowing names, Other State police, Jasper police,
Whitwell police, Sequatchie county police, and other drug task force
officers involved in incident

2. COURT: (If federal court, name the district; if state court, name the county):

3. DOCKET NUMBER: _____

4. Name of Judge to whom case was assigned: _____

5. Disposition: (For example: Was the case dismissed? Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. PLACE OF PRESENT CONFINEMENT: Bledso county correctional complex

A. Is there a prisoner grievance procedure in this institution? YES ☒ NO ()

B. Did you present the facts relating to your complaint in the prisoner grievance procedure? YES () NO ☒

C. If your answer is YES,

1. What steps did you take? _____

2. What was the result? _____

D. If your answer to B is NO, explain why not. Im in prison now. Where I

was at and am filing against is the county. i did mention what happen when i arrived in booking. i was told they had nothing to do with road officers.

E. If there is no prison grievance procedure in the institution, did you complain to the prison authorities? YES ☒ NO ()

F. If your answer is YES,

1. What steps did you take? I Still had blood on my clothes and told them that officers had beat me up is where the blood come from. they took my clothes washed them, and told me they had nothing to do with road cops and that I was safe in the jail.

2. What was the result? Nothing was done about it. Other than one of the workers brought me commissary and told me they didn't treat people that way in the jail.

III. PARTIES

(In item A below, please print your name in the first blank and place your present address in the second blank. Do the same for any additional plaintiffs.)

- A. Name of plaintiff: Jacob Seth Finley
Bledsoe county correction complex
Present address: 1045 horse head road pikeville TN 37361
Permanent home address: 899 parsonage Rd white pine TN 37890
Address of nearest relative: N/A

(In item B below, place the FULL NAME of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the additional names, positions, and places of employment of any additional defendants.)

- B. Defendant: Cory Cleek
Official position: Drug task force
Place of employment: Jasper police Department
- C. Additional defendants: Jasper drug task force, Jasper police department
Whitwell police Department, Marion county Sheriff Billy Woods,
Whitwell Chief of police Kenneth Seagraves, Whitwell Officer
Anna Simmons #803, Jasper patrolman Brian Davis, Jasper patrolman Robbie Dykes

IV. STATEMENT OF CLAIM

(State here as briefly as possible the FACTS of your case. Describe how EACH defendant is involved. Include also the names of other persons involved, dates and places. DO NOT give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.)

1. On march 20, 2024 I was involved in a high speed chase. I lead
multiple agencies including Sequatchie county, Whitwell, Marion,

and Jasper, and Tennessee State Troopers. In a pursuit that was initiated by Sequatchie county. At the end of the pursuit my tire had popped and I was no longer able to drive. I stopped the vehicle. I put my hands straight up and advised my passenger Teal Taylor to do the same. At which point DTF Cory Creek was at the passenger door ~~door~~ holding a gun pointed into the vehicle. Other officers rushed to the vehicle I was in. I could see them out the corner of my eye coming up on my driver window. My window was down but I still had my hands up and was focused on Drug task force Cory Creek. Next thing I know I was being punched in the face threw the open window ~~by~~ multiple officers including but not limited to Cory Creek, Robbie Dykes, Chief Kenneth Seagraves was present also. There was 5 different agencies involved during the chase. It's hard to say all names because I do not know them by name, just that they was the officers involved in being present or a part of the assault. During the assault I got my nose? ~~mouth~~ busted to a point I was dripping blood. Also broke front tooth in half, at some point I blacked out or something when I came back to they was dragging me out of the vehicle causing a laceration to my ~~right~~ ^{Right} Shin. I have a noticable scar from it took over a month to heal. I also had used the baton on myself and my right hand and half my arm from my ring finger, pinky, side of hand, and side of right arm a quarter to halfway was asleep/numb. Still is today. Once in the back of the patrol car of chief Kenneth Seagraves. Officer Anna Simmons came to the vehicle when she opened the,

Continue Statement of claim 2 of 4

back door, and looked at me. I was covered in blood from my injuries. Officer Anna Simmons did not ask was I ok. Nor how I got the injuries. Meaning she stood and watched the assault. Instead she told me "You stink" where I had used the restroom on myself during the assault. Then she ask who I ran with suggesting she assumed I was a gang member. She treated me in a discriminated manner as she was better than me and above the law. Chief Kenneth Seagraves also came to vehicle and spoke to me multiple times. I ask him was he one who was punching me in the face. He stated he came over and got the ones doing it to stop. Although I am honestly not sure that is the truth. I was dazed from being punched and it all happened so fast I can not recall where he actually was standing or doing. I was scared to move to much because I didnt want to get killed by officers with guns pointed at me so I just took the beating hoping they would stop before it went to far. I spoke with multiple officers from different agencies while being detained in Chief Seagraves patrol car. Each one seeing me covered in blood and clearly scared and upset. I requested all officers to turn on body cam. Officer Brian Davis, Chief Seagraves, Officer Anna Simmons, State Trooper Sgt. Charles D. Mcvey along with other officers I dont know their name stated they had them on or turned them on for me. So everything is on camera. Chief Seagraves did ask if I wanted Medical treatment once I was in the back of his car and wanted to know if I wanted EMT to come check me out. However when I told him yes since i had been assauid, and I think its good at this point to have things on record. Because I feel Im being targeted and am feeling scared and confused about it all. He replied "Everything is over now your ok nothing else is going to happen to you". I ask him so the police are not going to beat me up again when I get to the jail? He told me "No its all over" and shut the door.

* **Claim #3:** I was denied medical treatment twice, and never recieved medical care after requesting or ask if I needed medical treatment. Chief Kenneth Seagraves

ask me after placing me in backseat of his patrol car did I want EMT to come check me out or need medical attention. I told him yes. He instead told me I was fine nothing else was going to happen to me. Even though I had just been Assaulted and had visible injury. Second time I was refused by Chief Kenneth Seagraves along with Sgt. Charles D Mcvey of the State Police. This time I was at the hospital and when I came in a nurse noticed all the blood and brought me a wash cloth to wipe the blood. I ask was I going to get medical treatment for my injuries. I must have been using foul language, because Chief Seagraves told me to watch my language due to women working at the hospital. The nurse drawing blood was standing there so I ask again was I going to get to see medical. Chief Seagraves stated I would get to see triage / medical attention after I allowed the male nurse to draw blood for DUT. I spoke with both State Police Mcvey and Chief Seagraves about the assault and other issues while blood was being drawn. I also requested body cams to be on both Mcvey and Seagraves. Stated they was on. When nurse finished drawing blood, Seagraves took me out to smoke a cigarette. Then put me back in his car took me to Marion county jail without allowing medical to check me out. I suffered a nose injury (I think it was broken or atleast fractured) It was pouring blood, I had black eyes, a split lip that healed back where there is a hard spot on my lip from scar, ~~broken front~~ ^{or broken front} teeth, and knot on my head, like I said I blocked out or lost ~~consciousness~~ ^{ability} to be aware of surroundings or bodily functions my bowels released in my pants, so I could have suffered a concussion serious head injury. I also come to with numbness in my right ring finger, right hand pinky, the ^{cut} side, side of right hand, right outside of thumb and quarter up right arm is numb. I still have numbness in areas. I did mention to the nurse at Marion county jail. She told me it was most likely temporary paralysis. I also suffered a large deep laceration to my right shin. Still visible scar on my leg. A correction officer ask me during strip search what happen I told him the following while in the car after stopped the truck.

Continue Statement of claim 3 of 4

I was still so scared and worried something was going to happen to me. That I told the correction officer wings. That I needed to be moved to another county because I thought the whole thing had been a set up by Sevier county individuals connected with law enforcement. That I didn't feel safe in his jail that I thought some body there might get involved and assault me also. He assured me nothing of that nature was going to take place. He also thought it was not right they assaulted me. But gave some explanation guilty parties did, saying I shouldn't have ran and should have stayed. That is still no free reason to assault me. it is not part of no public servants duty to physically harm somebody intentionally.

* **Claim #3** I feel all other officers and agencies involved in pursuit. That came up on the final moments. That witnessed or seen the assault against me, ~~but~~ withheld their duty to uphold the law and allowed other officers to commit a felony crime. None of them stayed or reported the incident to proper authority. (This claim is against all parties involved in the pursuit, including but not limited to the following: 12th District: Jasper Department Drug Task Force, Jasper police Department, Whitwell police Department, Marion county Police Department, Sheriff Billy Woods, Whitwell Chief of Police - Kenneth Seagraves, Jasper Drug task Force - Carl Cleek, Jasper Patrolman - Robbie Dykes, Jasper Patrolman - Brian Davis, Whitwell officer - Anna Simmons, As well as Tennessee State Police - Sgt. Charles D. McVey).

These officers and agencies are guilty of being involved and not reporting a felony charge crime. Instead they turned a blind eye and treated their badge and uniforms. As a ~~ruleless~~ ruleless street gang who goes around committing cruel acts against others. Then seeing nothing wrong with their actions, and covering for each other to keep each other out of trouble. The officers listed and agencies

or chose to ignore a crime being committed against a citizen in the community they swore to protect and treat fair and just.

Instead Officer Anna Simmons and Drug task Force early clerk. lied on their formal Affidavit of complaint. Making up things or accusing me of things that are not true. To shift blame or justify actions that are ~~unjustifiable~~ unjustifiable. What happen to me was Felony Aggravated Assault with a ~~deadly~~ ^{deadly} weapon vs. A hand gun and physical assault by multiple individuals at one time. [Aggravated assault with a deadly weapon. The State of Tennessee classifies as follows: Causing a person to reasonably fear imminent bodily injury, said assault being accomplished by the display of a deadly weapon to wit: (A GUN) in violation of T.C.A. 39-13-116. All which is against the peace and dignity of the state of Tennessee.]

I was being assaulted while at gun point. I had no choice or even the thought of anything, ~~other than~~ ^{other than} I thought if I even tried to defend myself I would be shot and killed. I was scared to do anything and thought that they was going to get away with murder. I didnt understand why nobody would help and hoped it would be over before anything to serious happened. ~~Instead~~ Instead I was charged ~~for~~ with aggravated Assault on first responder for running and then striking my vehical trying to pit manouver me or wreck me and Aggravated Assault on first responder for driving around spike strips. All 3 assault charges are against officers involved in the physical assault against me (None had injury) what they told me was it was aggravated due to causing them reasonably fear imminent bodily injury because I was in a vehical. Yet them jumping me more than one assaiving me at one time while at gun point causing physical/physicological damage. Im parinod of everyone fear of being hurt, I think all uniforms are plotting against me when I see them I have perment Scaring as well as numbness that has yet to go away. I Suffered Physical ~~injuries~~ ^{injuries} that caused bleeding, knots ~~and~~ ^{and} head trauma that caused me to

Continue Statement of Claim 4 of 4

black out and lose ~~breath~~ the ability to hold my bowel movements. Yet nobody is to be held accountable for their actions. Instead they try and justify me running as a reason to do these things. I also suffered broken front tooth and my left eye when I look out the corner I see a black spot none of which I had before assault took place

V. RELIEF

(State BRIEFLY exactly what you want this Court to do for you. Make NO legal arguments.

Cite NO cases or statutes.)

* Better copy
and understanding
attached to back
of this form.
It's labeled
V. Relief.

Due to the traumatic situation I am always worried that ~~these~~
people in uniform are unpredictable. I feel paranoid and worried
around anybody in uniform correction officers, security guards, and
for sure police officers. I also ~~too~~ am scared of normal people now think
they are plotting against me or I play in my mind getting jumped/assaulted
I want to be compensated for life long therapy and medication needed
for PTSD and generalizing Anxiety. I have been diagnosed with each person removed from
their role, because they are sworn to protect the community not assault us or put us in fear.
I (We) hereby certify under penalty of perjury that the above complaint is true to the best of
my (our) information, knowledge and belief.

Signed this 16th day of December, 2024.

Joseph Limley
Signature of plaintiff(s)

Attached to page 5 of ~~my~~ complaint for violation of civil Rights.
(42 U.S.C. Section 1983)

V. Relief

{ state BRIEFLY exactly what you want this Court to do for you. Make }
{ No legal arguments cite NO cases or statutes. }

Due to situation, I know that all officers are not what we think they are. I found out they are capable of causing real harm and they get away with it. I am forever changed. Certain noises, movements, and uniforms with a badge I start to panic and can't breathe. I think something is going to happen to me.

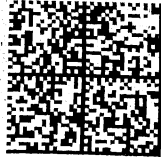
- I'm asking for the court to find all parties guilty and make them provide me the funds for life long treatment for PTSD and Generalizing Anxiety. [I have documentation I have recently been diagnosed with. This situation has twisted and changed my whole outlook. I'm scared to go in crowds or even leave areas as my cell in prison or any set safe area.] • Also funds for any medication I might ~~have~~ need or any coping mech. might be needed

- I also am asking for emotional distress, along with a investigation and for listed officers and others that are found to be in violation or involved. Be removed from their Duties. As well as funds to replace / remove, and Implant permanent veneure, for my tooth that was broken.

Signed this: Jacob Limley day of December 09, 2024

Jacob Finley #563552 unit 24A
1045 Horsehead Rd
Pikeville TN 37367

X-RAYED



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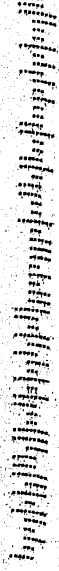


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